



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 28, 2020

BY ECF AND EMAIL

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joel Pena,*
18 Cr. 640 (RA)**

Dear Judge Abrams:

The parties have conferred regarding the anticipated change-of-plea hearing, currently scheduled for Friday, May 1, 2020. If it is acceptable to the Court, the parties jointly and respectfully request an approximately 30-day adjournment, to permit counsel additional time to confer with the defendant regarding the Government's plea offer, which was issued in March 2020. That plea offer will continue to remain open for at least the duration of the requested adjournment. The Government also requests, with consent of the defense, for a corresponding exclusion of time under the Speedy Trial Act to facilitate discussions about a potential disposition of this matter. *See* 18 U.S.C. § 3161(h)(7)(A).

Application granted. The change-of-plea hearing is adjourned to June 4, 2020 at 2:30 p.m. Time is excluded until June 4, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. 3161(h)(7)(a).

SO ORDERED.

Ronnie Abrams, U.S.D.J.
April 28, 2020

Respectfully submitted,

GEOFFREY S. BERMAN
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Southern District of New York

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cc: William J. Stampur, Esq. (by ECF and email)